Compliance Assurance Monitoring (CAM) Guidance

1. Applicability Requirements for CAM (all items must apply)

- Emission unit is located at a major source that is required to obtain a Title V permit.
- Emission unit is subject to emission limitation or standard for the applicable pollutant.
- Emissions unit uses a control device to achieve compliance.
- Potential precontrol emissions of applicable pollutant from the emission unit are at least 100 percent of major source amount.
- Emission unit is not otherwise exempt (see Part 2).

2. CAM Rule Exemptions

- a. Exempted Emission Limitations or Standards
 - Post 11/15/90 NSPS or NESHAP (MACT).
 - Stratospheric ozone protection requirements.
 - Acid Rain Program Requirements.
 - Emission limitations or standards for which a Title V permit specifies a continuous compliance determination that does not use an assumed control factor (see Part 3).

b. Exempt Emission Units

- Backup Utility Power Units that:
 - 1) are owned by a municipality
 - 2) are exempt from all monitoring requirement in Part 75
 - 3) are operated solely for providing electricity during peak periods in emergency situations, and

4) for which actual emissions for the previous three years are less than 50 percent of the major source cutoff and are expected to remain so.

3. Examples of Continuous Compliance Determination Methods

a. Monitoring Method

• Continuous emission monitoring systems (CEMS) which are used to determine compliance with an emission limitations or standard on a continuous basis, consistent with the averaging period established for the emission limitations or standard and provide data in units of the standard.

b. Specific Examples of Monitoring Method

- NO_x and SO_2 CEMS specified in Part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for which Construction is Commenced after September 18, 1978.
- ${\rm NO_x}$ and ${\rm SO_2}$ CEMS specified in Part 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.
- NO_x CEMS specified in Part 60, Subpart Dc, Standards of Performance for Small-Industrial-Commercial-Institutional Steam Generating Units.
- NO_x and SO_2 , and CO CEMS specified in Part 60, Subpart Ea, Standards of Performance for Municipal Waste Combustors.
- SO₂ CEMS for Fluid Catalytic Cracking Units Regenerators specified in Part 60, Subpart J, Standards of Performance for Petroleum Refineries.

4. Summary of Submittal Requirements for CAM

- Information on indicators, indicator ranges or process by which indicators are to be established, and performance criteria.
- Justification for the proposed elements of the monitoring.

- Control device operating data recorded during performance test, supplemented by engineering assessments or manufacturer's recommendations to justify the proposed indicator range.
- Test plan and schedule for obtaining data, if performance test data are not available.
- Implementation plan, if monitoring requires installation, testing, or other activities prior to implementation.

5. Summary of Required Permit Conditions or Terms

- The approved monitoring approach, including the indicators to be monitored, the method of measuring the indicators, and the performance criteria specified in 40 CFR Part 64, Section 64.3 (monitoring design criteria) of the CAM rule.
- The means of defining exceedances or excursions, the level which constitutes an exceedance or excursions, and the procedures for notifying the permitting authority of the establishment or reestablishment of any exceedance or excursion level.
- The obligation to conduct monitoring and satisfy the requirements of the 40 CFR Part 64, Sections 64.7 through 64.9 (Operation of approved monitoring, quality improvement plan (QIP) and reporting and recordkeeping requirements).
- If appropriate, the minimum data availability requirement for valid data collection for each averaging period and, if appropriate, the minimum data availability requirement for the averaging periods in a reporting period.

A complete copy of the **Technical Guidance Document: Compliance Assurance Monitoring** can be obtained at the following EPA website:

http://www.epa.gov/ttn/emc/cam.html.